



*Consulting Engineers
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February 2, 2010
(PBW Project No. 1584)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-RA)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: January 2010 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including participation in a meeting with EPA and other representatives regarding the revised Updated Screening-Level Ecological Risk Assessment (SLERA) dated December 22, 2009, and preparation of the Final Baseline Human Health Risk Assessment (BHHRA) based on EPA comments on an August 31, 2009 draft of that document as provided in your letter dated January 14, 2010.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new data were received or generated during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:

- Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan – performance of additional ecological risk assessment activities following EPA review of the revised updated SLERA dated December 22, 2009, and preparation/submittal of the Final BHHRA.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Although not required by the UAO, the Respondents listed above submitted a letter dated January 12, 2010 providing comments on EPA's December 8, 2009 Draft of an Administrative Settlement Agreement and Order on Consent for Removal Action. A Draft Work Plan for that Removal Action was subsequently submitted to you on January 14, 2010. Based on EPA's response to the letter and Draft Work Plan, other activities beyond those described above may be performed during the next two months.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Ray Merrell – Sequa Corporation
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Donnie Belote - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP